

HAZARDOUS WASTE GENERATOR COMPLIANCE INSPECTION CHECKLIST

Industrial Wastes Generated

(List all solid and hazardous wastes. List hazardous wastes first)

Waste description or process	If waste is hazardous give HW ID Number	Amount generated per month	Amount presently in storage	Oldest accumulation start date	Present disposal methods

General Requirements (GGR)				
	YES	NO	NA	V#
1. Has the generator evaluated each potentially hazardous waste(s) to determine if it is hazardous? KAR 28-31-4(b)	9	9		
a. If waste(s) was tested, was the analysis conducted by a laboratory certified by KDHE? KAR 28-31-4(b)(3)(A)	9	9	9	
b. If waste(s) was tested, are the results kept for three years from date waste was sent on/offsite for T/S/D? KAR 28-31-4(f)(1)(C)	9	9	9	
c. If waste was not tested, did the generator use process knowledge? KAR 28-31-4(b)	9	9	9	
2. If hazardous waste(s) is disposed of via the sanitary sewer to a Publicly Owned Treatment Works (POTW), has the generator received written approval from the City - POTW?	9	9	9	
3. Has the facility obtained a Special Waste Disposal Authorization (SWDA) for each subject waste? KAR 28-29-109(c)	9	9	9	
a. List the SWDA authorization number(s): _____				
4. If the generator recycles hazardous waste on-site (such as in a still), do they count waste each time prior to its being recycled? KAR 28-31-4(o)	9	9	9	
If the waste is not counted, is it exempt because of a closed loop system? KAR 28-31-4(o)	9	9		

General Requirements:	9 Compliance	9 Non-Compliance	9 NA
------------------------------	---------------------	-------------------------	-------------

Notification Requirements (GGR)

5. Has generator notified KDHE and obtained an EPA Identification Number? KAR 28-31-4(c)(1)	9	9		
6. Is current notification accurate? KAR 28-31-4(c)(1)	9	9	9	

Notification Requirements:	9 Compliance	9 Non-Compliance	9 NA
-----------------------------------	---------------------	-------------------------	-------------

Non-Accumulating Small Quantity Generator				
	YES	NO	NA	V#
7. If the SQG is accumulating less than 25 kg of hazardous waste on-site,				
a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? KAR 28-31-4(m)(2)	9	9	9	
b. Is the SQG sending this waste off-site for treatment, storage, or disposal? KAR 28-31-4(m)(2)	9	9	9	

Non-Accumulating SQG Requirements:	9 Compliance	9 Non-Compliance	9 NA
(small quantity generator not accumulating, stop here)			

Accumulating Small Quantity Generator				
8. If the SQG is accumulating 25 kg or more of hazardous waste,				
a. Is the SQG recycling, treating, or disposing of this waste on-site in an acceptable manner? KAR 28-31-4(m)(2)	9	9	9	
b. If the SQG is sending waste off-site for treatment, storage, or disposal, is the waste sent to a TSD or some other approved waste management facility? KAR 28-31-4(m)(2)	9	9	9	

Accumulating SQG Requirements:	9 Compliance	9 Non-Compliance	9 NA
---------------------------------------	---------------------	-------------------------	-------------

Pre-Transport Requirements (GPT)				
9. Does generator package, label (flammable liquid, poison, etc.), and mark (consignee's or consignor's name and address, etc.) waste in accordance with the requirements outlined in 49 CFR Parts 172, 173, 178, and 179 (DOT)? KAR 28-31-4(e)	9	9		
a. Does generator mark each container of 110 gallons or less as below? KAR 28-31-4(e)(3)(B)	9	9	9	
<div style="border: 1px solid black; padding: 10px; text-align: center;"> <i>Hazardous Waste-Federal Law Prohibits Improper Disposal.</i> <i>If found, contact the nearest police or public safety authority or the US EPA.</i> <i>Generator's Name and Address</i> <i>Manifest Document Number</i> </div>				
10. Does generator only use a transporter who has registered with the department and obtained an EPA Identification Number? KAR 28-31-4(c)(2)	9	9		

Pre-Transport Requirements:	9 Compliance	9 Non-Compliance	9 NA
------------------------------------	---------------------	-------------------------	-------------

Storage Requirements (GPT)				
----------------------------	--	--	--	--

	YES	NO	NA	V#
11. If generator temporarily stores waste in containers,				
a. Is each container clearly marked with the words "Hazardous Waste"? KAR 28-31-4(g)(3) or KAR 28-31-4(h)(4) or KAR 28-31-4(m)(2)(B)	9	9		
b. Is the accumulation start date marked on each container? KAR 28-31-4(g)(2) or KAR 28-31-4(h)(3) or KAR 28-31-4(m)(2)(B)	9	9		
c. Are all containers holding hazardous waste in good condition and closed during storage except when necessary to add or remove waste? KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) or KAR 28-31-4(m)(2)(B)	9	9		
d. Does generator conduct weekly inspections of containers for signs of leakage and/or deterioration caused by corrosion or other factors? KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A) or KAR 28-31-4(m)(2)(B)	9	9		
A. If yes, are these inspections documented in a log that includes complete date and time of inspection, name of inspector, notations of observations, and date and nature of remedial actions? KAR 28-31-4(k)	9	9		
12. If SQG or Kansas generator is accumulating 2,200 lbs (1,000 kg) or more of hazardous waste (or 2.2 lbs (1 kg) or more of acutely hazardous waste), then check yes and continue with EPA generator requirements.	9		9	

Storage Requirements:	9 Compliance	9 Non-Compliance	9 NA
-----------------------	--------------	------------------	------

(Small quantity generator accumulating <1,000 Kilograms stop here)

Storage Requirements for Kansas and EPA Generators (GPT)				
--	--	--	--	--

	YES	NO	NA	V#
13. If waste in containers is incompatible with other materials stored nearby, are the containers separated from the other materials by means of a dike, berm, wall, or other means? KAR 28-31-4(g)(1)(A) or KAR 28-31-4(h)(2)(A)	9	9	9	
14. Is EPA generator storing hazardous waste for 90 days or less? KAR 28-31-4(g)	9	9	9	
15. Are containers holding ignitable or reactive waste(s) located at least 15 meters (50 feet) from the generator's property line? (EPA Generator Only) KAR 28-31-4(g)(1)(A)	9	9	9	

(If waste(s) is placed in tanks complete the appropriate inspection checklist.)

Storage Requirements:	9 Compliance	9 Non-Compliance	9 NA
-----------------------	--------------	------------------	------

Satellite Accumulation Requirements for Kansas and EPA Generators (GPT)				
---	--	--	--	--

16. If the Kansas or EPA generator has satellite accumulation areas,				
a. Is 55-gallons or less of each waste stream accumulated at or near the point of generation, in one container, which is under the control of the operator of the process generating that waste? KAR 28-31-4(j)(1)	9	9		
b. Is each container in good condition and closed except to add or remove waste? KAR 28-31-4(j)(1)(A)	9	9		
c. Is each container marked with the words "Hazardous Waste"? KAR 28-31-4(j)(1)(B)	9	9		
d. Is each container marked with the accumulation start date at the time more than 55-gallons is accumulated, or an additional container is started for the same waste stream? KAR 28-31-4(j)(2)	9	9	9	
e. Is each container managed as a storage container within three days of no longer meeting the definition of a satellite container? KAR 28-31-4(j)(2)	9	9	9	

Satellite Accumulation Requirements:	9 Compliance	9 Non-Compliance	9 NA
--------------------------------------	--------------	------------------	------

Manifests (GMR)

YES NO NA V#

- | | | | | |
|-----|--|---|---|---|
| 17. | If a contractual agreement is used in place of manifesting? (Kansas Generators only) | | | |
| a. | Does the contractual agreement include the type of waste and frequency of shipments? KAR 28-31-4(d)(7)(A) | 9 | 9 | 9 |
| b. | Is the vehicle used to transport the waste owned and operated by the reclaimer of the waste? KAR 28-31-4(d)(7)(B) | 9 | 9 | 9 |
| c. | Is a copy of the agreement kept for a period of three years after termination of agreement? KAR 28-31-4(d)(7)(C) | 9 | 9 | 9 |
| 18. | If required, is a hazardous waste manifest used? KAR 28-31-4(d)(1) | 9 | 9 | 9 |
| a. | If yes, does each manifest include: | | | |
| 1. | Generator EPA identification number (12 digit) and unique manifest document number (five digit)? KAR 28-31-4(d)(1) | 9 | 9 | |
| 2. | Number of pages? KAR 28-31-4(d)(1) | 9 | 9 | |
| 3. | Generator's name and mailing address? KAR 28-31-4(d)(1) | 9 | 9 | |
| 4. | Generator's phone number? KAR 28-31-4(d)(1) | 9 | 9 | |
| 5. | Each transporter's name? KAR 28-31-4(d)(1) | 9 | 9 | |
| 6. | Each transporter's EPA identification number? KAR 28-31-4(d)(1) | 9 | 9 | |
| 7. | Name and site address of designated facility? KAR 28-31-4(d)(1)(A) | 9 | 9 | |
| 8. | Designated facility's EPA identification number? KAR 28-31-4(d)(1) | 9 | 9 | |
| 9. | Waste description (DOT shipping name, hazard class, packing group and identification number)? KAR 28-31-4(d)(1) | 9 | 9 | |
| i. | If applicable, are the requirements of 49 CFR 172.203(k) met? KAR 28-31-4(d)(1) | 9 | 9 | 9 |
| 10. | Number and type of containers? KAR 28-31-4(d)(1) | 9 | 9 | |
| 11. | Total quantity? KAR 28-31-4(d)(1) | 9 | 9 | |
| 12. | Unit (weight or volume)? KAR 28-31-4(d)(1) | 9 | 9 | |
| 13. | Special handling instructions (if applicable)? KAR 28-31-4(d)(1) | 9 | 9 | |
| 14. | Generator's certification including waste minimization statement, generator's signature and date? KAR 28-31-4(d)(4)(A) | 9 | 9 | |
| 15. | Name, signature, and date of initial transporter? KAR 28-31-4(d)(4)(B) | 9 | 9 | |
| b. | Does generator retain a copy of each manifest signed and dated by both generator and transporter? KAR 28-31-4(d)(4)(B) and/or KAR 28-31-4(d)(4)(C) | 9 | 9 | 9 |
| c. | Does generator retain a copy of each manifest(s) signed and dated by T/S/D facility owner/operator for three years? KAR 28-31-4(f)(1)(A) | 9 | 9 | 9 |
| d. | If generator has failed to receive a signed copy of a manifest within 45 days of initiating a shipment, was an exception report filed? KAR 28-31-4(f)(4)(B) | 9 | 9 | 9 |
| 1. | If yes, was copy retained for three years? KAR 28-31-4(f)(1)(B) | 9 | 9 | 9 |

Manifesting Requirements:

9 Compliance

9 Non-Compliance

9 NA

Land Disposal Restriction Requirements (GLB)

YES NO NA V#

- | | | | | |
|-----|---|---|---|---|
| 19. | If the generator's waste is not subject to the Land Disposal Restrictions regulations, please explain why: _____ | | | |
| 20. | If the generator sent waste not meeting the treatment standards to an off-site treatment or storage facility, did the generator provide a one-time written notice with the initial shipment of each different waste stream? 40 CFR 268.7(a)(2) | 9 | 9 | 9 |
| a. | Did the notice include: EPA hazardous waste number, manifest number, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored), wastewater or non-wastewater classification, waste subcategory (if any), and waste analysis data, if available? 40 CFR 268.7(a)(2) | 9 | 9 | 9 |
| 21. | If the generator sent waste meeting the treatment standards to an off-site treatment, storage facility, or disposal facility, did the generator provide a one-time written notice and signed certification statement with the initial shipment to each TSD receiving the waste which certified the waste met the applicable treatment standards? 40 CFR 268.7(a)(3) | 9 | 9 | 9 |
| a. | Did the notice include: EPA hazardous waste number, manifest number, F001-F005, F039 constituents and each underlying hazardous constituents to be monitored (unless all monitored), wastewater or non-wastewater classification, waste subcategory (if any), and waste analysis data, if available? 40 CFR 268.7(a)(2) | 9 | 9 | 9 |
| 22. | If the generator treated waste in tanks or containers to meet applicable treatment standards: | | | |
| a. | Did the generator have a written waste analysis plan on-site describing procedures used to comply with the treatment standards? 40 CFR 268.7(a)(5) | 9 | 9 | 9 |
| b. | If the generator sent the treated waste off-site, did the generator provide a notice and signed certification statement with the initial shipment? 40 CFR 268.7(a)(5)(iii) | 9 | 9 | 9 |
| 23. | Has the generator retained copies of all notices, certifications, waste analysis data, and other documents for at least 3 years from the last date the corresponding waste was last managed on-site or shipped off-site? 40 CFR 268.7(a)(8) | 9 | 9 | 9 |
| 24. | If the generator claims that his characteristic waste is no longer hazardous: | | | |
| a. | Did the generator submit a one-time notice and signed certification to the KDHE and retain a copy for their files? 40 CFR 268.9(d) | 9 | 9 | 9 |
| b. | Is the information on the notice and certification current? 40 CFR 268.9(d) | 9 | 9 | 9 |

Note: If a generator's waste is subject to any Land Disposal Restriction regulations not covered above, then please discuss these situations in the summary.

LDR Requirements:

9 Compliance

9 Non-Compliance

9 NA

Special Conditions (GSC)

YES NO NA V#

25. If the generator has shipped/received hazardous waste to/from a foreign source, did they comply with the requirements of 40 CFR 262.53 and/or 40 CFR 262.54?

9 9 9

If hazardous waste was shipped/received to/from a foreign source, please describe in summary.

Special Conditions Requirements:

9 Compliance

9 Non-Compliance

9 NA

Kansas Generator's Emergency Preparedness (GPT)

26. Has generator designated one employee as emergency coordinator?

KAR 28-31-4(h)(6)

9 9

- a. Is the emergency coordinator available to respond to an emergency by reaching the facility within a short period of time? **KAR 28-31-4(h)(6)**

9 9

- b. Is the emergency coordinator or his/her designee prepared to respond to any emergencies (fires, spills, or releases) that arise? **KAR 28-31-4(h)(9)**

9 9

27. Is the following information posted next to at least one telephone which is accessible with little or no delay in an emergency? **KAR 28-31-4(h)(7)**

- a. Name and telephone number of the emergency coordinator(s)? **KAR 28-31-4(h)(7)(A)**

9 9

- b. Location of fire extinguishers and spill-control material and if available fire alarms?

KAR 28-31-4(h)(7)(B)

9 9

- c. Telephone number of fire department unless facility has a direct alarm (911 is acceptable)? **KAR 28-31-4(h)(7)(C)**

9 9

28. Have employees been trained so that they are familiar with proper waste handling and emergency procedures that are relevant to their responsibilities during normal facility operations? **KAR 28-31-4(h)(8)**

9 9

KS Gen.'s Emergency Preparedness Requirements:

9 Compliance

9 Non-Compliance

9 NA

Hazardous Waste Reporting (GRR)

29. Has Kansas or EPA generator submitted an annual monitoring fee and report to KDHE?

KAR 28-31-10(g)(1) or KAR 28-31-10(g)(3)

9 9

30. Has EPA generator submitted a biennial report(s) to KDHE? **KAR 28-31-4(f)(2)(A)**

9 9 9

- a. Does generator retain a copy of the report for three years? **KAR 28-31-4(f)(1)(B)**

9 9 9

Hazardous Waste Reporting Requirements:

9 Compliance

9 Non-Compliance

9 NA

Preparedness and Prevention (GPT)
--

YES NO NA V#

31. Has the generator maintained and operated the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents? **40 CFR 265.31** 9 9 9
32. **If appropriate**, based upon the nature and quantity of waste(s) generated and stored at the facility, is the facility equipped with:
- a. Internal communication or alarm system easily accessible in case of emergency? **40 CFR 265.32(a)** 9 9 9
 - b. Telephone or hand-held two-way radio capable of summoning emergency assistance from local police departments, fire departments, or State or local emergency response teams? **40 CFR 265.32(b)** 9 9 9
 - c. Portable fire extinguisher, fire control equipment, spill control equipment, and decontamination equipment? **40 CFR 265.32(c)** 9 9 9
 - d. Is water of adequate volume provided for hose streams, foam producing equipment, sprinklers, etc.? **40 CFR 265.32(d)** 9 9 9
 - e. Is this equipment (a-c above) tested and maintained to ensure its proper operation? **40 CFR 265.33** 9 9 9
33. Does a check of the facility show sufficient aisle space to allow unobstructed movement of personnel and equipment? **40 CFR 265.35** 9 9 9
34. **If appropriate**, for the type(s) of waste handled, has the generator made the following arrangements:
- a. Familiarized the local emergency authorities with the facility, waste(s) handled, entrances and exits? **40 CFR 265.37(a)(1)** 9 9 9
 - b. Designated one authority where one or more police or fire departments might respond to an emergency? **40 CFR 265.37(a)(2)** 9 9 9
 - c. Made agreements with local emergency response teams, emergency response contractors, and equipment suppliers? **40 CFR 265.37(a)(3)** 9 9 9
 - d. Familiarized local hospitals with the properties of hazardous waste(s) handled and types of injuries which could result from fires, explosions, or releases at the facility. **40 CFR 265.37(a)(4)** 9 9 9
35. Do personnel have immediate access to an internal alarm or emergency communications device, either directly or through visual or contact with another employee, when handling hazardous waste (unless such a device is not required under § 265.32)? **40 CFR 265.34** 9 9 9
36. In cases where local authorities decline to enter into such arrangements, is the refusal documented? **40 CFR 265.37(b)** 9 9 9

Preparedness and Prevention Requirements:
--

9 Compliance

9 Non-Compliance

9 NA

(If Kansas generator, stop here)

Personnel Training (GPT)				
	YES	NO	NA	V#
37. Has the generator established a hazardous waste management training program?				
40 CFR 265.16(a)(1)	9	9		
a. Is the program directed by a person trained in hazardous waste management?				
40 CFR 265.16(a)(2)	9	9		
b. Are new personnel trained within six months after their employment or placement to a new position? 40 CFR 265.16(b)	9	9		
c. Are new employees supervised until training is completed? 40 CFR 265.16(b)	9	9		
d. After initial training, are employees trained on an annual basis? 40 CFR 265.16(c)	9	9		
e. Does the generator maintain the following documents and records:				
1. Job title for each position related to hazardous waste management and the name of the employee filling each job? 40 CFR 265.16(d)(1)	9	9		
2. Written job description for each position? 40 CFR 265.16(d)(2)	9	9		
3. Description of type and amount of both introductory and continuing training to be given each person? 40 CFR 265.16(d)(3)	9	9		
4. Records of training given to facility personnel? 40 CFR 265.16(d)(4)	9	9		
5. Are training records kept on all current and past employees? 40 CFR 265.16(e)	9	9		
Personnel Training Requirements:	9 Compliance	9 Non-Compliance	9 NA	
Contingency Plan (GPT)				
38. Does the generator have a contingency plan? 40 CFR 265.51(a)	9	9		
If yes,				
a. Does the plan list the name(s), home address, and phone number (home and office) of each designated emergency coordinator in the order in which they should be contacted? 40 CFR 265.52(d)	9	9		
b. Is an emergency coordinator available at all times? 40 CFR 265.55	9	9		
c. Does the plan describe emergency actions facility personnel must take to respond to fires, explosions, or releases of hazardous waste? 40 CFR 265.52(a)	9	9		
d. Does the plan describe arrangements made with emergency response agencies? 40 CFR 265.52(c)	9	9		
e. Does the plan include a list of all emergency equipment at the facility, its location, a physical description of each item on the list, and a brief outline of the capabilities of each item? 40 CFR 265.52(e)	9	9		
f. Does the plan include an evacuation plan for facility personnel that describes signals and evacuation routes? 40 CFR 265.52(f)	9	9		
g. Have copies of the plan been provided to outside emergency response agencies and hospitals? 40 CFR 265.53(b)	9	9		
h. If implementation of the plan has been required at the facility, was the generator required to submit a written report on the incident to the KDHE? 40 CFR 265.56(j)	9	9	9	
1. If yes, was the written report submitted? 40 CFR 265.56(j)	9	9	9	
Contingency Plan Requirements:	9 Compliance	9 Non-Compliance	9 NA	

(if EPA generator, stop here.)

V# = Violation Number

Additional Information and Conclusions:
--

Other items: